

SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN BERNARDINO  
RANCHO CUCAMONGA DISTRICT

THE PEOPLE OF THE STATE OF CALIFORNIA,	)	COURT CASE NO. FWV1100989
	)	
Plaintiff	)	FIRST AMENDED
	)	
vs.	)	FELONY COMPLAINT
	)	
SCMS, Inc., dba ServiceMaster,	)	
Steven Manchester ,	)	
Dale Roberts , and	)	DA CASE NO. 2011-00-0018302
Heather Anne Reavis	)	
	)	
Defendants	)	

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The undersigned is informed and believes that:

COUNT 1

On or about January 1, 2005 through December 31, 2009, in the above named judicial district, the crime of GRAND THEFT OF PERSONAL PROPERTY, in violation of PENAL CODE SECTION 487(a), a felony, was committed by ServiceMaster, Steven Manchester, Dale Roberts and Heather Anne Reavis, who did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit, Cash, in the amount of \$793,269.61, the property of Allstate Insurance.

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## COUNT 2

On or about January 1, 2005 through December 31, 2009, in the above named judicial district, the crime of GRAND THEFT OF PERSONAL PROPERTY, in violation of PENAL CODE SECTION 487(a), a felony, was committed by ServiceMaster, Steven Manchester, Dale Roberts and Heather Anne Reavis, who did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit, cash in the amount of \$104,371.53 the property of AMCO Insurance.

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## COUNT 3

On or about January 1, 2005 through December 31, 2009, in the above named judicial district, the crime of GRAND THEFT OF PERSONAL PROPERTY, in violation of PENAL CODE SECTION 487(a), a felony, was committed by ServiceMaster, Steven Manchester, Dale Roberts and Heather Anne Reavis, who did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit, cash in the amount of \$5,749.88 the property of American Bankers Insurance Co. of Florida.

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## COUNT 4

On or about January 1, 2005 through December 31, 2009, in the above named judicial district, the crime of GRAND THEFT OF PERSONAL PROPERTY, in violation of PENAL CODE SECTION 487(a), a felony, was committed by ServiceMaster, Steven Manchester, Dale Roberts and Heather Anne Reavis, who did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit, cash in the amount of \$128,488.55 the property of American Claims Management.

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#### COUNT 5

On or about January 1, 2005 through December 31, 2009, in the above named judicial district, the crime of GRAND THEFT OF PERSONAL PROPERTY, in violation of PENAL CODE SECTION 487(a), a felony, was committed by ServiceMaster, Steven Manchester, Dale Roberts and Heather Anne Reavis, who did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit, cash in the amount of \$5,082.97 the property of American Security Insurance Co.

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#### COUNT 6

On or about January 1, 2005 through December 31, 2009, in the above named judicial district, the crime of GRAND THEFT OF PERSONAL PROPERTY, in violation of PENAL CODE SECTION 487(a), a felony, was committed by ServiceMaster, Steven Manchester, Dale Roberts and Heather Anne Reavis, who did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit, cash in the amount of \$14,535.44 the property of American Modern Insurance Group.

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#### COUNT 7

On or about January 1, 2005 through December 31, 2009, in the above named judicial district, the crime of GRAND THEFT OF PERSONAL PROPERTY, in violation of PENAL CODE SECTION 487(a), a felony, was committed by ServiceMaster, Steven Manchester, Dale Roberts and Heather Anne Reavis, who did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit, cash in the amount of \$29,108.80 the property of Balboa Insurance Group.

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#### COUNT 8

On or about January 1, 2005 through December 31, 2009, in the above named judicial district, the crime of GRAND THEFT OF PERSONAL PROPERTY, in violation of PENAL CODE SECTION 487(a), a felony, was committed by ServiceMaster, Steven Manchester, Dale Roberts and Heather Anne Reavis, who did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit, cash in the amount of \$299,282.58 the property of CA Fair Plan Association.

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#### COUNT 9

On or about January 1, 2005 through December 31, 2009, in the above named judicial district, the crime of GRAND THEFT OF PERSONAL PROPERTY, in violation of PENAL CODE SECTION 487(a), a felony, was committed by ServiceMaster, Steven Manchester, Dale Roberts and Heather Anne Reavis, who did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit, cash in the amount of \$69,583.75 the property of California Casualty.

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#### COUNT 10

On or about January 1, 2005 through December 31, 2009, in the above named judicial district, the crime of GRAND THEFT OF PERSONAL PROPERTY, in violation of PENAL CODE SECTION 487(a), a felony, was committed by ServiceMaster, Steven Manchester, Dale Roberts and Heather Anne Reavis, who did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit, cash in the amount of \$460,108.62 the property of Century-National Insurance Co.

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#### COUNT 11

On or about January 1, 2005 through December 31, 2009, in the above named judicial district, the crime of GRAND THEFT OF PERSONAL PROPERTY, in violation of PENAL CODE SECTION 487(a), a felony, was committed by ServiceMaster, Steven Manchester, Dale Roberts and Heather Anne Reavis, who did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit, cash in the amount off \$20,843.74 the property of Crusader Insurance Co.

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#### COUNT 12

On or about January 1, 2005 through December 31, 2009, in the above named judicial district, the crime of GRAND THEFT OF PERSONAL PROPERTY, in violation of PENAL CODE SECTION 487(a), a felony, was committed by ServiceMaster, Steven Manchester, Dale Roberts and Heather Anne Reavis, who did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit, cash in the amount of \$67,127.63 the property of Empire Fire and Marine Insurance Co.

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#### COUNT 13

On or about January 1, 2005 through December 31, 2009, in the above named judicial district, the crime of GRAND THEFT OF PERSONAL PROPERTY, in violation of PENAL CODE SECTION 487(a), a felony, was committed by ServiceMaster, Steven Manchester, Dale Roberts and Heather Anne Reavis, who did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit, cash in the amount of \$2,545,249.33 the property of Farmers Insurance.

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#### COUNT 14

On or about January 1, 2005 through December 31, 2009, in the above named judicial district, the crime of GRAND THEFT OF PERSONAL PROPERTY, in violation of PENAL CODE SECTION 487(a), a felony, was committed by ServiceMaster, Steven Manchester, Dale Roberts and Heather Anne Reavis, who did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit, cash in the amount of \$85,327.89 the property of Fidelity National Insurance Co.

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#### COUNT 15

On or about January 1, 2005 through December 31, 2009, in the above named judicial district, the crime of GRAND THEFT OF PERSONAL PROPERTY, in violation of PENAL CODE SECTION 487(a), a felony, was committed by ServiceMaster, Steven Manchester, Dale Roberts and Heather Anne Reavis, who did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit, cash in the amount of \$793,269.61 the property of Allstate Insurance.

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#### COUNT 16

On or about January 1, 2005 through December 31, 2009, in the above named judicial district, the crime of GRAND THEFT OF PERSONAL PROPERTY, in violation of PENAL CODE SECTION 487(a), a felony, was committed by ServiceMaster, Steven Manchester, Dale Roberts and Heather Anne Reavis, who did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit, cash in the amount of \$206,550.44 the property of First American Specialty Insurance Co.

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#### COUNT 17

On or about January 1, 2005 through December 31, 2009, in the above named judicial district, the crime of GRAND THEFT OF PERSONAL PROPERTY, in violation of PENAL CODE SECTION 487(a), a felony, was committed by ServiceMaster, Steven Manchester, Dale Roberts and Heather Anne Reavis, who did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit, cash in the amount of \$3,441.99 the property of Formost Insurance Co.

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#### COUNT 18

On or about January 1, 2005 through December 31, 2009, in the above named judicial district, the crime of GRAND THEFT OF PERSONAL PROPERTY, in violation of PENAL CODE SECTION 487(a), a felony, was committed by ServiceMaster, Steven Manchester, Dale Roberts and Heather Anne Reavis, who did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit, cash in the amount of \$23,271.80 the property of Golden Eagle Insurance.

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#### COUNT 19

On or about January 1, 2005 through December 31, 2009, in the above named judicial district, the crime of GRAND THEFT OF PERSONAL PROPERTY, in violation of PENAL CODE SECTION 487(a), a felony, was committed by ServiceMaster, Steven Manchester, Dale Roberts and Heather Anne Reavis, who did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit, cash in the amount of \$73,314.64 the property of Horace Mann Insurance Co.



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#### COUNT 20

On or about January 1, 2005 through December 31, 2009, in the above named judicial district, the crime of GRAND THEFT OF PERSONAL PROPERTY, in violation of PENAL CODE SECTION 487(a), a felony, was committed by ServiceMaster, Steven Manchester, Dale Roberts and Heather Anne Reavis, who did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit, cash in the amount of \$115,729.19 the property of Interinsurance Exchange of the Automobile Club.

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#### COUNT 21

On or about January 1, 2005 through December 31, 2009, in the above named judicial district, the crime of GRAND THEFT OF PERSONAL PROPERTY, in violation of PENAL CODE SECTION 487(a), a felony, was committed by ServiceMaster, Steven Manchester, Dale Roberts and Heather Anne Reavis, who did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit, cash in the amount of \$436,377.89 the property of Mercury Insurance Group.

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#### COUNT 22

On or about January 1, 2005 through December 31, 2009, in the above named judicial district, the crime of GRAND THEFT OF PERSONAL PROPERTY, in violation of PENAL CODE SECTION 487(a), a felony, was committed by ServiceMaster, Steven Manchester, Dale Roberts and Heather Anne Reavis, who did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit, cash in the amount of \$240,187.33 the property of National Union Fire Insurance Company of Pittsburgh.

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#### COUNT 23

On or about January 1, 2005 through December 31, 2009, in the above named judicial district, the crime of GRAND THEFT OF PERSONAL PROPERTY, in violation of PENAL CODE SECTION 487(a), a felony, was committed by ServiceMaster, Steven Manchester, Dale Roberts and Heather Anne Reavis, who did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit, cash in the amount of \$15,319.27 the property of Nationwide Insurance.

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#### COUNT 24

On or about January 1, 2005 through December 31, 2009, in the above named judicial district, the crime of GRAND THEFT OF PERSONAL PROPERTY, in violation of PENAL CODE SECTION 487(a), a felony, was committed by ServiceMaster, Steven Manchester, Dale Roberts and Heather Anne Reavis, who did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit, cash in the amount of \$645,809.92 the property of Pacific Specialty Insurance Co.

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#### COUNT 25

On or about January 1, 2005 through December 31, 2009, in the above named judicial district, the crime of GRAND THEFT OF PERSONAL PROPERTY, in violation of PENAL CODE SECTION 487(a), a felony, was committed by ServiceMaster, Steven Manchester, Dale Roberts and Heather Anne Reavis, who did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit, cash in the amount of \$170,442.60 the property of Safeco Insurance Co.

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#### COUNT 26

On or about January 1, 2005 through December 31, 2009, in the above named judicial district, the crime of GRAND THEFT OF PERSONAL PROPERTY, in violation of PENAL CODE SECTION 487(a), a felony, was committed by ServiceMaster, Steven Manchester, Dale Roberts and Heather Anne Reavis, who did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit, cash in the amount of \$3,141,541.70 the property of State Farm General Insurance Co..

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#### COUNT 27

On or about January 1, 2005 through December 31, 2009, in the above named judicial district, the crime of GRAND THEFT OF PERSONAL PROPERTY, in violation of PENAL CODE SECTION 487(a), a felony, was committed by ServiceMaster, Steven Manchester, Dale Roberts and Heather Anne Reavis, who did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit, cash in the amount of \$278,649.06 the property of The Hartford.

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#### COUNT 28

On or about January 1, 2005 through December 31, 2009, in the above named judicial district, the crime of GRAND THEFT OF PERSONAL PROPERTY, in violation of PENAL CODE SECTION 487(a), a felony, was committed by ServiceMaster, Steven Manchester, Dale Roberts and Heather Anne Reavis, who did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit, cash in the amount of \$216,088.49 the property of The Travelers Indemnity Co.

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#### COUNT 29

On or about January 1, 2005 through December 31, 2009, in the above named judicial district, the crime of GRAND THEFT OF PERSONAL PROPERTY, in violation of PENAL CODE SECTION 487(a), a felony, was committed by ServiceMaster, Steven Manchester, Dale Roberts and Heather Anne Reavis, who did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit, cash in the amount of \$535,113.97 the property of Topa Insurance.

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### COUNT 30

On or about January 1, 2005 through December 31, 2009, in the above named judicial district, the crime of GRAND THEFT OF PERSONAL PROPERTY, in violation of PENAL CODE SECTION 487(a), a felony, was committed by ServiceMaster, Steven Manchester, Dale Roberts and Heather Anne Reavis, who did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit, cash in the amount of \$39,431.67 the property of Travelers Insurance.

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### COUNT 31

On or about January 1, 2005 through December 31, 2009, in the above named judicial district, the crime of GRAND THEFT OF PERSONAL PROPERTY, in violation of PENAL CODE SECTION 487(a), a felony, was committed by ServiceMaster, Steven Manchester, Dale Roberts and Heather Anne Reavis, who did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit, cash in the amount of \$1,435.26 the property of Unigard Indemnity Co.

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### COUNT 32

On or about January 1, 2005 through December 31, 2009, in the above named judicial district, the crime of GRAND THEFT OF PERSONAL PROPERTY, in violation of PENAL CODE SECTION 487(a), a felony, was committed by ServiceMaster, Steven Manchester, Dale Roberts and Heather Anne Reavis, who did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit, cash in the amount of \$11,162.14 the property of United Services Automobile Association.

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### COUNT 33

On or about January 1, 2005 through December 31, 2009, in the above named judicial district, the crime of GRAND THEFT OF PERSONAL PROPERTY, in violation of PENAL CODE SECTION 487(a), a felony, was committed by ServiceMaster, Steven Manchester, Dale Roberts and Heather Anne Reavis, who did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit, cash in the amount of \$1,585.80 the property of USAA Casualty Insurance Co.

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### COUNT 34

On or about January 1, 2005 through December 31, 2009, in the above named judicial district, the crime of GRAND THEFT OF PERSONAL PROPERTY, in violation of PENAL CODE SECTION 487(a), a felony, was committed by ServiceMaster, Steven Manchester, Dale Roberts and Heather Anne Reavis, who did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit, cash in the amount of \$23,690.21 the property of Workmans' Auto Insurance Co.

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### COUNT 35

On or about January 1, 2005 through December 31, 2009, in the above named judicial district, the crime of FORGERY, in violation of PENAL CODE SECTION 470(a), a felony, was committed by ServiceMaster, Steven Manchester, Dale Roberts and Heather Anne Reavis, who did, with the intent to defraud, and knowingly without authority to do so, sign the name of another person and of a fictitious person, to wit forged check endorsements in the name of Beneficial Rec. Proc. Serv. and Thomas Salisbury

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### COUNT 36

On or about January 1, 2005 through December 31, 2009, in the above named judicial district, the crime of FORGERY, in violation of PENAL CODE SECTION 470(a), a felony, was committed by ServiceMaster, Steven Manchester, Dale Roberts and Heather Anne Reavis, who did, with the intent to defraud, and knowingly without authority to do so, sign the name of another person and of a fictitious person, to wit forged check endorsements in the name of Countrywide Home Loans dba "Franklin Bank", and Ronald and Debra Lehman..

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### COUNT 37

On or about January 1, 2005 through December 31, 2009, in the above named judicial district, the crime of FORGERY, in violation of PENAL CODE SECTION 470(a), a felony, was committed by ServiceMaster, Steven Manchester, Dale Roberts and Heather Anne Reavis, who did, with the intent to defraud, and knowingly without authority to do so, sign the name of another person and of a fictitious person, to wit forged check endorsements in the name of Countrywide Home Loans and Richard Roberson..

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COUNT 38

On or about January 1, 2005 through December 31, 2009, in the above named judicial district, the crime of FORGERY, in violation of PENAL CODE SECTION 470(a), a felony, was committed by ServiceMaster, Steven Manchester, Dale Roberts and Heather Anne Reavis, who did, with the intent to defraud, and knowingly without authority to do so, sign the name of another person and of a fictitious person, to wit forged check endorsements in the name of Daniel and Carol Martin.

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COUNT 39

On or about January 1, 2005 through December 31, 2009, in the above named judicial district, the crime of FORGERY, in violation of PENAL CODE SECTION 470(a), a felony, was committed by ServiceMaster, Steven Manchester, Dale Roberts and Heather Anne Reavis, who did, with the intent to defraud, and knowingly without authority to do so, sign the name of another person and of a fictitious person, to wit Wells Fargo Bank, and Jose and Isabel Perez.

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COUNT 40

On or about January 1, 2005 through December 31, 2009, in the above named judicial district, the crime of FORGERY, in violation of PENAL CODE SECTION 470(a), a felony, was committed by ServiceMaster, Steven Manchester, Dale Roberts and Heather Anne Reavis, who did, with the intent to defraud, and knowingly without authority to do so, sign the name of another person and of a fictitious person, to wit forged check endorsements in the name of Citi Mortgage and Raymond Fountain..



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#### COUNT 41

On or about January 1, 2005 through December 31, 2009, in the above named judicial district, the crime of FORGERY, in violation of PENAL CODE SECTION 470(a), a felony, was committed by ServiceMaster, Steven Manchester, Dale Roberts and Heather Anne Reavis, who did, with the intent to defraud, and knowingly without authority to do so, sign the name of another person and of a fictitious person, to wit forged check endorsements in the name of IndyMac Bank and Noe and Mayra Beltran.

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#### COUNT 42

On or about January 1, 2005 through December 31, 2009, in the above named judicial district, the crime of FORGERY, in violation of PENAL CODE SECTION 470(a), a felony, was committed by ServiceMaster, Steven Manchester, Dale Roberts and Heather Anne Reavis, who did, with the intent to defraud, and knowingly without authority to do so, sign the name of another person and of a fictitious person, to wit forged check endorsements in the name of Visterra Credit Union, ServicePlus Credit Union, and Rosario and Velia Munoz..

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#### COUNT 43

On or about January 1, 2005 through December 31, 2009, in the above named judicial district, the crime of FORGERY, in violation of PENAL CODE SECTION 470(a), a felony, was committed by ServiceMaster, Steven Manchester, Dale Roberts and Heather Anne Reavis, who did, with the intent to defraud, and knowingly without authority to do so, sign the name of another person and of a fictitious person, to wit forged check endorsements in the name of Donna Romero.

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#### COUNT 44

On or about January 1, 2005 through December 31, 2009, in the above named judicial district, the crime of FORGERY, in violation of PENAL CODE SECTION 470(a), a felony, was committed by ServiceMaster, Steven Manchester, Dale Roberts and Heather Anne Reavis, who did, with the intent to defraud, and knowingly without authority to do so, sign the name of another person and of a fictitious person, to wit forged check endorsements in the name of Basil Bukle.

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#### COUNT 45

On or about January 1, 2005 through December 31, 2009, in the above named judicial district, the crime of FORGERY, in violation of PENAL CODE SECTION 470(a), a felony, was committed by ServiceMaster, Steven Manchester, Dale Roberts and Heather Anne Reavis, who did, with the intent to defraud, and knowingly without authority to do so, sign the name of another person and of a fictitious person, to wit forged check endorsements in the name of Kathryn Bretchel.

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#### COUNT 46

On or about July 1, 2005 through October 31, 2005, in the above named judicial district, the crime of WORKERS' COMPENSATION FRAUD, in violation of INSURANCE CODE SECTION 11880(a), a felony, was committed by ServiceMaster, Steven Manchester, Dale Roberts and Heather Anne Reavis, who did knowingly make and cause to be made a false and fraudulent statement, orally and in writing, of a fact material to the determination of the premium, rate, and cost of a policy of workers' compensation insurance issued and administered by the State Compensation Insurance Fund, for the purpose of reducing the premium, rate, and cost of insurance.

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#### COUNT 47

On or about November 1, 2005 through October 31, 2006, in the above named judicial district, the crime of WORKERS' COMPENSATION FRAUD, in violation of INSURANCE CODE SECTION 11880(a), a felony, was committed by ServiceMaster, Steven Manchester, Dale Roberts and Heather Anne Reavis, who did knowingly make and cause to be made a false and fraudulent statement, orally and in writing, of a fact material to the determination of the premium, rate, and cost of a policy of workers' compensation insurance issued and administered by the State Compensation Insurance Fund, for the purpose of reducing the premium, rate, and cost of insurance.

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#### COUNT 48

On or about November 1, 2006 through October 31, 2007, in the above named judicial district, the crime of WORKERS' COMPENSATION FRAUD, in violation of INSURANCE CODE SECTION 11880(a), a felony, was committed by ServiceMaster, Steven Manchester, Dale Roberts and Heather Anne Reavis, who did knowingly make and cause to be made a false and fraudulent statement, orally and in writing, of a fact material to the determination of the premium, rate, and cost of a policy of workers' compensation insurance issued and administered by the State Compensation Insurance Fund, for the purpose of reducing the premium, rate, and cost of insurance.

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COUNT 49

On or about November 1, 2007 through October 31, 2008, in the above named judicial district, the crime of WORKERS' COMPENSATION FRAUD, in violation of INSURANCE CODE SECTION 11880(a), a felony, was committed by ServiceMaster, Steven Manchester, Dale Roberts and Heather Anne Reavis, who did knowingly make and cause to be made a false and fraudulent statement, orally and in writing, of a fact material to the determination of the premium, rate, and cost of a policy of workers' compensation insurance issued and administered by the State Compensation Insurance Fund, for the purpose of reducing the premium, rate, and cost of insurance.

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COUNT 50

On or about November 1, 2008 through October 31, 2009, in the above named judicial district, the crime of WORKERS' COMPENSATION FRAUD, in violation of INSURANCE CODE SECTION 11880(a), a felony, was committed by ServiceMaster, Steven Manchester, Dale Roberts and Heather Anne Reavis, who did knowingly make and cause to be made a false and fraudulent statement, orally and in writing, of a fact material to the determination of the premium, rate, and cost of a policy of workers' compensation insurance issued and administered by the State Compensation Insurance Fund, for the purpose of reducing the premium, rate, and cost of insurance.

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## COUNT 51

On or about November 1, 2009 through January 21, 2011, in the above named judicial district, the crime of WORKERS' COMPENSATION FRAUD, in violation of INSURANCE CODE SECTION 11760(a), a felony, was committed by ServiceMaster, Steven Manchester, Dale Roberts and Heather Anne Reavis, who did knowingly make and cause to be made a false and fraudulent statement, orally and in writing, of a fact material to the workers' compensation insurance, for the purpose of reducing the determination of the premium, rate, and cost of a policy of premium, rate, and cost of insurance.

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It is further alleged, pursuant to Penal Code section 186.11(a)(2) that the offenses set forth in counts 1 through 34 are related felonies, a material element of which is fraud, which involve a pattern of related felony conduct, and the pattern of related felony conduct involves the taking of more than five hundred thousand dollars (\$500,000).

It is further alleged, pursuant to Penal Code section 186.11 (a)(3) that the offenses set forth in counts 1 through 34 are related felonies, a material element of which is fraud, which involve a pattern of related felony conduct, and the pattern of related felony conduct involves the taking of more than one hundred thousand dollars (\$100,000).

It is further alleged, pursuant to Penal Code section 186.11(a)(2) that the offenses set forth in counts 46 through 51 are related felonies, a material element of which is fraud, which involve a pattern of related felony conduct, and the pattern of related felony conduct involves the taking of more than five hundred thousand dollars (\$500,000).

It is further alleged, pursuant to Penal Code section 186.11 (a)(3) that the offenses set forth in counts 46 through 51 are related felonies, a material element of which is fraud, which involve a pattern of related felony conduct, and the pattern of related felony conduct involves the taking of more than one hundred thousand dollars (\$100,000).

It is further alleged as to counts 1 through 51 that in the commission of the above offenses the said defendant SCMS Inc, dba ServiceMaster of Rancho Cucamonga, with the intent to do so, took property of a value exceeding \$65,000 within the meaning of Penal Code section 12022.6(a)(1).

It is further alleged as to counts 1 through 51 that in the commission of the above offenses the said defendant SCMS Inc, dba ServiceMaster of Rancho Cucamonga, with the intent to do so, took property of a value exceeding \$200,000 within the meaning of Penal Code section 12022.6(a)(2).

It is further alleged as to counts 1 through 51 that in the commission of the above offenses the said defendant SCMS Inc, dba ServiceMaster of Rancho Cucamonga, with the intent to do so, took property of a value exceeding \$1,300,000 within the meaning of Penal Code section 12022.6(a)(3).

It is further alleged as to counts 1 through 51 that in the commission of the above offenses the said defendant SCMS Inc, dba ServiceMaster of Rancho Cucamonga, with the intent to do so, took property of a value exceeding \$3,200,000 within the meaning of Penal Code section 12022.6(a)(4).

It is further alleged as to Counts 1 through 51, offenses described in Penal Code section 803(c) and People v. Zamora (1976) 18 Cal.3d 538, that the following facts are true:

1. On May 29, 2007, Debra Lehman contacted Mercury Insurance, her homeowner's insurance company, indicating that defendants misrepresented information related to their work on her home resulting from a fire on November 29, 2005;
2. Lehman contracted with defendants to do repairs on her home as a result of the fire on November 29, 2005;
3. In response to this complaint, Pete Galassi, SIU Agent for Mercury Insurance started to investigate the claims of Debra Lehman;
4. On July 23, 2007, through his investigation, Pete Galassi learned from a Vincent Troy Schmidt, a public adjuster, that Seven Manchester and Bob Roberts, as owners of ServiceMaster, forged and/or directed the forgeries of the signatures of mortgagees and mortgage lenders as endorsements on the back of insurance checks issued to pay for repairs;
5. It was on this July 23, 2007 date, that the SIU (Special Investigations Unit) for Mercury Insurance learned of potential criminal activity related to the check endorsements.
6. Upon learning this, Galassi reviewed claims insured by Mercury Insurance in cases where defendants were contracted to do repairs, specifically Lehman, Salisbury, and Leor claims.
7. The review of the claims above revealed that checks issued by Mercury Insurance in the name of the defendant company, the mortgagee, and mortgage lenders were not being properly endorsed by either the mortgagee or the mortgage lender

8. The review of the entire ServiceMaster business, as prompted from Mercury Insurance Company's investigation detailed above, uncovered data revealing that the defendants were misrepresenting information about the company to their Workers' Compensation Insurance carriers during those time periods, by intentionally misclassifying the job duties of a number of their employees.
9. None of the information provided above would have been known or learned until Mercury Insurance representatives learned of the potential forgery on July 23, 2007.

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#### NOTICE TO DEFENDANT AND DEFENDANT'S ATTORNEY

Pursuant to Penal Code Sections 1054.5.(b), the People are hereby informally requesting that defense counsel provide discovery to the People as required by Penal Code Section 1054.3.

#### NOTICE TO ATTORNEY

The materials accompanying this notice may include information about witnesses. If so, these materials are disclosed to you pursuant to Penal Code section 1054.2 which provides: "No attorney may disclose or permit to be disclosed to a defendant the address or telephone number of a victim or witness whose name is disclosed to the attorney pursuant to subdivision (a) of Section 1054.1 unless specifically permitted to do so by the court after a hearing and a showing of good cause."

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT AND THAT THIS COMPLAINT CONSISTS OF 51 COUNT(S).

Executed at San Bernardino, California, on June 21, 2011.

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DW Simon, DDA  
DECLARANT AND COMPLAINANT

Agency: Dept of Insurance Fraud Rancho

Prelim Est. 04:00

Defendant	Birth Date	Booking No.	CII No.
ServiceMaster			
Steven Manchester	06/06/1960	1104341444	H26465407
Dale Roberts	10/22/1959	1104341448	
Heather Anne Reavis	05/04/1970	1104341442	



